

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHNNY FLORES, ARIEL GOMEZ and	)	
DERRICK LEWIS, for themselves and others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:20-cv-01128
	)	
MOTOROLA SOLUTIONS, INC., and	)	Honorable Charles R. Norgle Sr.
VIGILANT SOLUTIONS, LLC,	)	
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION TO MODIFY PROPOSED  
BRIEFING SCHEDULE AND FOR LEAVE TO FILE EXCESS PAGES**

Defendants Motorola Solutions, Inc. (“Motorola”) and Vigilant Solutions, LLC (“Vigilant”) (together, “Defendants”) respectfully move this Court for the entry of an Order: (i) modifying the proposed briefing schedule with respect to Defendants’ forthcoming motion to dismiss; and (ii) granting Defendants leave to file a memorandum in support of their motion to dismiss in excess of 15 pages. In support of this motion, Defendants state as follows:

1. On May 18, 2020, the parties filed a joint status report that set forth a proposed agreed briefing schedule with respect to Defendants’ motion to dismiss that provided Defendants’ motion to dismiss would be due on June 15, 2020. (Dkt. No. 19 at 2.)

2. Counsel for Defendants have worked diligently to prepare the memorandum in support of Defendants’ motion to dismiss, and Defendants have reviewed drafts of that memorandum. Counsel for Defendants have determined that, in order to address certain substantive comments Defendants have provided to counsel, Defendants will require two additional days, until June 17, 2020, to finalize and file their motion to dismiss. In order to preserve

the intervals in the previously proposed schedule, Defendants also propose that the date for Plaintiffs to file their response be extended from June 29, 2020 to July 1, 2020, and the date for Defendants to file their reply be extended from July 9, 2020 to July 11, 2020.

3. The requested modification of the proposed briefing schedule is made in good faith, and not for the purpose of delay. The requested modification will not prejudice Plaintiffs.

4. In addition, despite their efforts to limit their supporting memorandum to the 15-page limit set forth in the Local Rules, Defendants may require up to an additional three pages. Plaintiffs' Complaint asserts multiple counts against Defendants that raise numerous legal issues. Defendants therefore respectfully request leave to file a supporting memorandum that exceeds the page limit by up to three pages.

5. Counsel for Defendants have conferred with Plaintiffs' counsel regarding the relief requested in this motion, and Plaintiffs' counsel has no objection to the modification of the proposed briefing schedule or the requested leave to file excess pages. Defendants have no objection to the Plaintiffs obtaining three additional pages for their response.

WHEREFORE, Defendants respectfully request that the Court grant this motion and enter an Order: *(i)* modifying the proposed briefing schedule with respect to Defendants' forthcoming motion to dismiss to provide the Defendants' motion to dismiss will be filed on June 17, 2020, Plaintiffs' response will be filed July 1, 2020, and Defendants' reply will be filed July 11, 2020, and *(ii)* granting Defendants and Plaintiffs leave to file, respectively, their motion to dismiss and response by at most three pages over the 15-page limit.

Dated: June 15, 2020

Respectfully submitted,

MOTOROLA SOLUTIONS, INC. and  
VIGILANT SOLUTIONS, LLC

By: /s/ David C. Layden  
One of their attorneys

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**CERTIFICATE OF SERVICE**

I, David C. Layden, an attorney, hereby certify that, on June 15, 2020, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ David C. Layden  
*One of Defendants' Attorneys*